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GEORGE D. WEBSTER (1921-1996)  
OF COUNSEL  
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CHARLES E. CHAMBERLAIN

June 23, 1997

F. Andrew Turley, Esq.  
Supervisory Attorney  
Central Enforcement Docket  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

Re: MUR 4634  
The Madison Project Incorporated Fund

Dear Mr. Turley:

As indicated by the enclosed designation of counsel, our firm has been retained to represent The Madison Project Incorporated Fund and David E. Pearson, its Treasurer ("MPIF"), in connection with MUR 4634. The complaint underlying MUR 4634 alleges, inter alia, that John H. and Ruth Stauffer made contributions to MPIF which were "earmarked" as contributions to be directed to the 1996 Brownback for Senate Campaign. The contributions received by MPIF from the Stauffers were not "earmarked" or otherwise directed (by the Stauffers) to the 1996 Brownback for Senate Campaign and, therefore, MUR 4634 should be dismissed in regard to MPIF.

MPIF is a multicandidate political committee which was active in supporting federal candidates during 1996. On or about July 20 1996, MPIF received an unsolicited contribution of \$2,500 from John H. Stauffer and an unsolicited contribution of \$2,500 from Mrs. John H. Stauffer. Mr. and Mrs. Stauffer had not previously made contributions to MPIF, were unknown to MPIF, and had no contact with MPIF prior to the date of their contributions. The contribution checks received by MPIF from the Stauffers were not accompanied by any correspondence and in no way did the Stauffers instruct, earmark, indicate directly or indirectly, or imply that their contributions to MPIF should be used for the Brownback for Senate Campaign. MPIF made no effort to solicit the Stauffer's input on how MPIF would utilize the contributions.

As part of its normal activities in support of federal candidates during 1996, MPIF did make a \$5,000 contribution to the Brownback for Senate Campaign. At the time of that contribution (as

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well as at the time the contributions from the Stauffer's were received), no one at MPIF had any knowledge that the Stauffers were related to Sam Brownback. The contribution from MPIF to the Brownback for Senate Campaign was solely based on the decision of MPIF to support that campaign and was not influenced in any way by Mr. or Mrs. Stauffer.

The complaint in MUR 4634 is directed at alleged violations of the federal election laws by the Stauffers and the Brownback for Senate Campaign. To the extent if any, that the Commission deems the complaint as being directed against MPIF, the foregoing presentation concerning the handling by MPIF of the contributions from the Stauffers demonstrates that MPIF fully complied with the federal election laws. As a result, the Commission should vote that there is no reason to believe that MPIF violated the federal election laws and should dismiss MUR 464 as it pertains to MPIF.

Respectfully submitted,



Frank M. Northam

FMN/ctb

cc: David E. Pearson  
Doug Domenech

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Jun. 9, 1997 12:17PM

CHAMBERLAIN &amp; BEAN

No. 9802 P. 3/3

**STATEMENT OF DESIGNATION OF COUNSEL**MUR 4634NAME OF COUNSEL: Alan P. Dye, Frank M. Northam, David P. GochFIRM: Webster, Chamberlain & BeanADDRESS: Suite 10001747 Pennsylvania Avenue, N.W.Washington, DC 20006TELEPHONE: (202) 785-9500FAX: (202) 835-0249

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/9/97  
Date  
SignatureRESPONDENT'S NAME: David E. Pearson, TreasurerADDRESS: The Madison Project Incorporated FundP. O. Box 479Hamilton, VA 22068

TELEPHONE: HOME

BUSINESS: (540) 338-5600

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